

June 25, 2018

Via Hand Delivery
Ms. Marlene H. Dortch
Secretary
Fodoral Communications Commission

Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310

Dear Ms. Dortch,

TeleQuality Communications, LLC ("TeleQuality") hereby submits for the Commission's approval additional interstate rural rates for purposes of providing service to healthcare providers ("HCPs") through the Rural Health Care Telecommunications Program.

TeleQuality is currently working with HCPs seeking telecommunications services for 2018 through the Telecommunications Program. To establish its rural rates for 2018, TeleQuality has followed the requirements of 47 C.F.R. § 54.607 and the recent USAC guidance. TeleQuality does not provide service to commercial customers other than HCPs, so it cannot calculate rural rates based on the average rate charged to commercial customers for similar services pursuant to 47 C.F.R. § 54.706(a) (USAC's Method 1). In some cases, TeleQuality may be able to establish a rural rate by calculating the average of tariffed or other publicly available rates for similar services in the same rural area pursuant to 47 C.F.R. § 54.706(b) (USAC's Method 2). In cases where due diligence has not revealed any tariffed or other publicly available rates for "the same or similar services in that rural area over the same distance as the eligible service," or where TeleQuality has reasonably determined that Method 2 results in a rate that is "unfair," TeleQuality must submit its rates for interstate services to the Commission for approval pursuant to 47 C.F.R. § 54.607(b) (USAC Method 3).

Attached please find TeleQuality's interstate rates for the Telecommunications Program for Funding Year 2018 (shown in Attachment 1 as the TeleQuality 2018 Interstate Rate Sheet) for areas served using USAC Method 3. Also attached, as required by 47 C.F.R. § 54.706(b)(1), is the justification for TeleQuality's rural rates including cost itemizations (shown in Attachment 2 as the TeleQuality 2018 Interstate Rate Cost Justification).

These rates are all for services that are interstate interexchange and/or CLEC business data services, and which were subject to competitive bidding. As such, these are all services that

¹ USAC, *Telecom Program: Urban and Rural Rates*, https://www.usac.org/_res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf.

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the Commission has mandatorily or permissively detariffed because of the presence of a competitive market. See 47 C.F.R. § 61.19; Hyperion Telecommunicatons Inc. Petition Requesting Forbearance, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 12 FCC Rcd 8596 (1997) ("[W]e have previously determined that [CLECs] are nondominant, and that nondominant carriers, 'by definition,' cannot exercise market power.") See also 47 C.F.R. § 61.201 (detariffing ILEC business data services). Moreover, even if a tariff were filed (which is no longer permitted for interexchange services, including interexchange private lines), these are rates charged by a nondominant carrier and thus would be considered prima facie lawful and permitted to take effect on one day's notice. See 47 C.F.R. § 1.773(a)(ii). As such, although the margins for individual contract prices vary, as would be expected under competitive bidding in which bids are submitted in advance based on estimated costs, that variance does not create a basis for determining these rates to be unreasonable or not cost-based. Indeed, forcibly setting a different rate distorts the market and harms consumers. See Nat'l Ass'n of Telecommunications Officers & Advisors v. Fed. Commc'ns Comm'n, 862 F.3d 18, 25 (D.C. Cir. 2017) ("Rate regulation of a firm in a competitive market harms consumers.")

The TeleQuality 2018 Interstate Rate Cost Justification (Attachment 2) contains forward-looking estimates of TeleQuality's costs during the 2018 Funding Year, and thus contains business-sensitive confidential information. Pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, TeleQuality hereby requests confidential treatment of Attachment 2, which should be withheld from public inspection.

In support of this request, TeleQuality hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

TeleQuality seeks confidential treatment with respect to the TeleQuality 2018 Interstate Rate Cost Justification (the "Confidential Information"). TeleQuality does not seek confidential treatment with respect to the information contained in the TeleQuality 2018 Interstate Rate Sheet.

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

TeleQuality is disclosing the Confidential Information pursuant to 47 C.F.R. § 54.607(b)(1). TeleQuality needs to establish some of its rural rates under the Telecommunications Program by submitting those rates to the Commission. As required by the rules, the submission must include "a justification of the proposed rural rate, including an itemization of the costs of providing the requested service." *Id*.

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3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information in the TeleQuality 2018 Interstate Rate Cost Justification is commercial or financial and contains trade secret information. The justifications for TeleQuality's rates include detailed information regarding the prices TeleQuality pays to its wholesale providers as well as TeleQuality's own costs to serve HCPs. In addition, the Cost Justification includes information about how TeleQuality provisions services to HCPs to meet their unique business needs; this information describes TeleQuality's internal business practices and techniques and is sensitive commercial information.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The market for the services at issue is subject to competition; the level of competition varies based on the element of the service and the specific location.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

First, disclosure of the information in the response would provide TeleQuality's competitors with sensitive insights related to TeleQuality's services and how it provisions its services to meet its customers' unique needs. Disclosure of this information would allow TeleQuality's competitors to use this information to determine TeleQuality's competitive position and associated revenues and thereby gain a competitive advantage. Second, disclosure of TeleQuality's Confidential Information would place TeleQuality at a competitive disadvantage, as TeleQuality lacks the same information regarding its competitors. Third, disclosure of the information could damage TeleQuality's relationships with its wholesale providers, to the extent that it has purchased wholesale inputs at rates that are not generally publicly available. Finally, disclosure of this information could harm the competitive bidding process in the RHC program.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

The Cost Justification has been kept private and internal to TeleQuality and its parent company. Each page of Attachment 2 is clearly marked "TeleQuality Proprietary – Not for Public Disclosure."

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

TeleQuality has not previously disclosed to third parties, other than its counsel, its parent company, and relevant state commissions any of the information in the Cost Justification.

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8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))

TeleQuality requests that the Cost Justification not be disclosed for 10 years from the date of this request. By that time, the sensitivity of TeleQuality's commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge TeleQuality's current market position and revenues.

* * * *

Should you have further questions or require additional information in order to grant the requested confidentiality treatment, please contact me immediately so that I can provide further assistance to resolve this matter.

Sincerely,

John T. Nakahata

Counsel to TeleQuality Communications, LLC

Attachs.

Circuit Information		
Circuit Address	19056 Greenbush Road, Parksley, VA 23421	
Billing Account Number	ESB.VA.0019	
Speed	100 mb Ethernet	
Rate	\$ 5,695.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	19059 Greenbush Road, Parksley, VA 23421	
Billing Account Number	ESB.VA.0020	
Speed	100 mb Ethernet	
Rate	\$ 5,495.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	15159 Merry Cat Ln, Belle Haven, VA 23306	
Billing Account Number	ESB.VA.0021	
Speed	10 mb Ethernet	
Rate	\$ 2,500.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	10106 Pine Ave, Nassawadox, VA 23413		
Billing Account Number	ESB.VA.0022		
Speed	45	mb	
Rate	\$	3,995.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	3462 Main Street, Exmore, VA 23350		
Billing Account Number	ESB.VA.0023		
Speed	20 mb Ethernet		
Rate	\$ 2,500.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	_		
Transport and interconnection costs			
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
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Circuit Information		
Circuit Address	10151 Sila Court, Nassawadox, VA 23413	
Billing Account Number	ESB.VA.0028	
Speed	10 mb Ethernet	
Rate	\$ 2,500.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	36128 Indian Lane, Belle Haven, VA 23306	
Billing Account Number	ESB.VA.0029	
Speed	10 mb Ethernet	
Rate	\$ 2,500.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	3462 Main Street, Exmore, VA 23350	
Billing Account Number	ESB.VA.0033	
Speed	100 mb Ethernet	
Rate	\$ 2,250.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
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Circuit Information		
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Rate	\$	15,706.30
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Circuit Information			
Circuit Address	2644 Encino Park Dr, Eagle Pass, TX 78852		
Billing Account Number	CAM.TX.0019		
Chood	100 mb Ethe	rn at	
Speed	100 mb Etne	inet	
Rate	\$	10,557.00	
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Circuit Costs	\$		
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Circuit Information			
Circuit Address	2644 Encino Park Dr, Eagle Pass, TX 78852		
Billing Account Number	CAM.TX.0020		
Speed	100 mb Ethernet		
Rate	\$ 8,636.0	00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
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Circuit Information			
Circuit Address	19971 FM 3175, Lytle, TX 7805		
Billing Account Number	CAM.TX.0022		
Speed	100 mb Ethernet		
Rate	\$ 10,557.0	00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address 1323 3rd St, Floresville, TX 78		3114
Billing Account Number	CAM.TX.0032	
Speed	45 mb	
Rate	\$ 7,96	55.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
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Circuit Information		
Circuit Address 411 E Brazos, Pearsall, TX 7		061
Billing Account Number	CAM.TX.0033	
Speed	100 mb Ethernet	
Rate	\$ 5,77	0.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	315 N First Ave, Crystal City, TX 78839	
Billing Account Number	CAM.TX.0034	
Speed	100 mb	Ethernet
Rate	\$	5,515.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address 1005 B Street, Floresville, TX 78	
Billing Account Number	CAM.TX.0035
Speed	100 mb Ethernet
Rate	\$ 5,410.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
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Working capital	
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Circuit Address	1749 Highway 97 E, Jourdanton, TX 78026	
Billing Account Number	CAM.TX.0036	
Speed	100 mb E	thernet
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Rate	\$	5,457.00
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Circuit Address	757 E Rio Grande St, Eagle Pass, TX 78852	
Billing Account Number	CAM.TX.0037	
Speed	100 mb Ethernet	
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Rate	\$	5,886.00
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Circuit Address	322 W Main, Kenedy, TX 78119	
Billing Account Number	CAM.TX.00	38
Speed	100	mb Ethernet
Rate	\$	6,347.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
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Circuit Information	
Circuit Address 1323 3rd St, Floresville, TX 7	
Billing Account Number	CAM.TX.0039
Speed	100 mb Ethernet
Rate	\$ 5,410.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
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Circuit Information		
Circuit Address	1007 Veterans Ave, Crystal City, TX 78839	
Billing Account Number	CAM.TX.0040	
Speed	100 mb Ethernet	
Data	6	F F1F 00
Rate	\$	5,515.00
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Circuit Costs	\$	
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Circuit Information		
Circuit Address	613 W Zavala St, Crystal City, TX 78839	
Billing Account Number	CAM.TX.0041	
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Rate	\$	5,515.00
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Circuit Information		
Circuit Address	509 Martin Branch Road, Dilley, TX 78017	
Billing Account Number	CAM.TX.0042	
C I	100 1 - 51 1	
Speed	100 mb Ethernet	
Rate	\$ 6,119.00	
Cost Itemization -		
Circuit Costs	\$	
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Circuit Information		
Circuit Address 101 N Commerce, Dilley, TX 7		
Billing Account Number	CAM.TX.0043	
Speed	100 mb Ethernet	
Rate	\$ 5,099.00	
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Circuit Address 540 10th St, Floresville, TX 78		
Billing Account Number	CAM.TX.0044	
Speed	100 mb Ethernet	
Rate	\$ 5,410.00	
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Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
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Circuit Information			
Circuit Address	510 Avenue H, Poteet, TX 78065		
Billing Account Number	CAM.TX.0045		
Speed	100 mb Ethernet		
Rate	\$ 4,360	0.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
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Pre-tax cost itemization			
Federal and State Income Tax			
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Circuit Information			
Circuit Address	109 N River St, Seguin, TX 7815		
Billing Account Number	CAM.TX.0046		
Speed	100 mb Ethernet		
Rate	\$ 4,360.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
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Circuit Information		
Circuit Address	1080 Crown Ridge, Eagle Pass, TX 78852	
Billing Account Number	CAM.TX.0047	
Speed	100 mb Ethernet	
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Rate	\$	5,886.00
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Circuit Information			
Circuit Address	203 Hackberry St, Tilden, TX 78078		
Billing Account Number	CAM.TX.00)48	
Speed	100 mb Ethernet		
Rate	\$	3,000.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
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Circuit Information			
Circuit Address	55 S Market St, San Jose, CA 95113		
Billing Account Number	NCH.AZ.0024		
Speed	1 gb Ethernet		
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Rate	\$ 11,800.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and coming delivery costs			
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
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Circuit Information			
Circuit Address	301 N Oak Street, Sheridan, AR 72150		
Billing Account Number	SEA.AR.0012		
Speed	10 mb ethernet		
Rate	\$ 4,984.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	301 N Oak Street, Sheridan, AR 72150		
Billing Account Number	SEA.AR.0013		
Speed	N x T-1		
Rate	\$	4,164.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circu	it Information		
Circuit Address	121 Commercial Drive B, Stuttgart, AR 72160		
Billing Account Number	SEA.AR.0015		
Speed	N x T-1		
Rate	\$ 4,164.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
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Circuit Information			
Circuit Address	612 E Arkansas Street, Star City, AR 71667		
Billing Account Number	SEA.AR.0016		
Speed	N x T-1		
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Rate	\$	4,164.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit	Information
Circuit Address	111 South Laurel Street, Luling, TX 78648
Billing Account Number	GON.TX.0002
Speed	N x T-1
Rate	\$ 10,356.50
Cost Itemization -	
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Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
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Federal and State Income Tax	
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Circuit Information			
Circuit Address	275 S Jackson Street, Bastrop, TX 78602		
Billing Account Number	GON.TX.0003		
Speed	N x T-1		
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Rate	\$ 10,356.50		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
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Pre-tax cost itemization			
Federal and State Income Tax			
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Percentage Margin			

Circuit Inf	ormation		
Circuit Address	902 W 2nd Street, Elgin, TX 78621		
Billing Account Number	GON.TX.0007		
Speed	N x T-1		
Rate	\$ 10,356.50		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit	Information		
Circuit Address	228 St George Street, Gonzales, TX 78269		
Billing Account Number	GON.TX.0008		
Speed	45 mb		
Rate	\$ 22,792.98		
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Cost Itemization -			
Circuit Costs	\$		
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Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circu	it Information	
Circuit Address	2060 S Colorado Hwy 183, Lo	ckhart, TX 78644
Billing Account Number	GON.TX.0009	
Speed	N x T-1	
Rate	\$	10,356.50
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	220 E. Crofoot, Sheridan, MT 59749		
Billing Account Number	RVH.MT.0002		
Speed	100 mb Ethernet		
Rate	\$ 5,000.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	104 South Madison, Twin Bridges, MT 59754		
Billing Account Number	RVH.MT.0003		
Speed	45 mb		
Rate	\$ 2,755.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Inform	ation		
Circuit Address		lighway 27, Summerville	, GA 30747
Billing Account Number	PHC.GA		
Speed	500	mb Ethernet	
Rate	\$	8,270.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Inform	ation	
Circuit Address	11638 Highway 27, S	ummerville, GA 30747
Billing Account Number	PHC.GA.0003	
Speed	500 mb Ethernet	
Rate	\$ 8,463.	00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Inform	ation		
Circuit Address	118 E Gi	rard Ave, Cedartow	n, GA 30125
Billing Account Number	PHC.GA	.0004	
Speed	100	mb Ethernet	
Rate	\$	2,941.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Inform	ation		
Circuit Address	106 E W	ithers St, Lafayette,	GA 30728
Billing Account Number	PHC.GA		
Speed	100	mb Ethernet	
Rate	\$	4,505.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	13570 North Main Street		
Billing Account Number	PHC.GA.0006		
Speed	100 mb Ethernet		
Rate	\$ 26,259.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Inform			
Circuit Address	1430 Su	ggs Street, Rossv	ille, GA 3074:
Billing Account Number	PHC.GA.	0007	
Speed	100	mb Ethernet	
Rate	\$	3,403.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Inform				
Circuit Address	134 Rhea McClanahan Drive, Tunnel Hill, GA 30755			
Billing Account Number	PHC.GA.0008			
Speed	100 mb Ethernet			
Rate	\$	38,450.00		
Cost Itemization -				
Circuit Costs	\$			
Transport and Interconnection costs		-		
Operating and service delivery costs				
Working capital				
Pre-tax cost itemization				
Federal and State Income Tax				
Margin				
Percentage Margin				

Circuit Information				
Circuit Address	87 S Bur	nt Mill Rd, Lafayette	, GA 30728	
Billing Account Number	PHC.GA.	0009		
Speed	100	mb Ethernet		
Rate	\$	4,505.00		
Cost Itemization -				
Circuit Costs	\$			
Transport and Interconnection costs		-		
Operating and service delivery costs				
Working capital				
Pre-tax cost itemization				
Federal and State Income Tax				
Margin				
Percentage Margin				

Circuit Information					
Circuit Address	15921 Boundary Drive, Ashland, MS 38603				
Billing Account Number	NMP.MS.0007				
Speed	500mb Ethernet				
Rate	\$ 11,876.00				
Cost Itemization -					
Circuit Costs	\$				
Transport and Interconnection costs	-				
Operating and service delivery costs					
Working capital					
Pre-tax cost itemization					
Federal and State Income Tax					
Margin					
Percentage Margin					

Circuit Information		
Circuit Address	749 South Line St	reet, Ripley, MS 38663
Billing Account Number	NMP.MS.0008	
Speed	50 m	nb Ethernet
Rate	\$	4,391.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	208 North First Street, Booneville, M	S 38829
Billing Account Number	NMP.MS.0009	
Speed	20 mb Ethernet	
Rate	\$	3,964.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information					
Circuit Address	531 Main Street, Walnut, MS 38683				
Billing Account Number	NMP.MS.0011				
Speed	20 mb Ethernet				
Rate	\$ 3,964.00				
Cost Itemization -					
Circuit Costs	\$				
Transport and Interconnection costs	-				
Operating and service delivery costs					
Working capital					
Pre-tax cost itemization					
Federal and State Income Tax					
Margin					
Percentage Margin					

Circuit Information					
Circuit Address	232 Starlyn Avenue, New Albany, MS 38652				
Billing Account Number	NMP.MS.0012				
Speed	20 mb Ethernet				
Rate	\$ 3,964.00				
Cost Itemization -					
Circuit Costs	\$				
Transport and Interconnection costs	-				
Operating and service delivery costs					
Working capital					
Pre-tax cost itemization					
Federal and State Income Tax					
Margin					
Percentage Margin					

Circuit Information			
Circuit Address 1425 S Harper Road, Corinth, MS			
Billing Account Number	NMP.MS.0013		
Speed	20 mb Ethernet		
Data	¢ 4.400.00		
Rate	\$ 4,480.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
5 1 1 10 1 1			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information				
1310 Main Street, Tishomingo, MS 38873		1310 Main Street, Tishomingo, MS 38873		
NMP.MS.0014				
10 mb Etherne	et			
_ \$	5,889.56			
<u>-</u> -				
_ \$				
	-			
	1310 Main Street, Tishomin NMP.MS.0014 10 mb Etherne	1310 Main Street, Tishomingo, MS 38873 NMP.MS.0014 10 mb Ethernet \$ 5,889.56		

Circuit Information			
Circuit Address	15921 Boundary Drive, Ashland, MS 38603		
Billing Account Number	NMP.MS.0015		
Speed	1 g	b Ethernet	
Rate	- \$	5,108.00	
Cost Itemization -	- -		
Circuit Costs	- \$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit	Informati	ion		
Circuit Address	749 South Line Street, Ripley, MS 38663		- -	
Billing Account Number	NMP.MS.	0016	-	
Speed		100 mb Ethernet		
Rate	_ _ \$	3,000.00		
Cost Itemization -	_ _			
Circuit Costs	_ _ \$			
Transport and Interconnection costs		-		
Operating and service delivery costs				
Working capital				
Pre-tax cost itemization				
Federal and State Income Tax				
Margin				
Percentage Margin] [-	
			_	

Circuit Information			
Circuit Address	208 North First Street, Booneville, MS 38829		
Billing Account Number	NMP.MS.0017		
Snood	100 mb Ethernet		
Speed			
Rate	\$ 3,000.00		
Cost Itemization -	-		
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	531 Main Street, Walnut, MS 38683		
Billing Account Number	NMP.MS.0018		
Chand	100 mela Etib avva et		
Speed	100 mb Ethernet		
Rate	\$ 3,000.00		
Cost Itemization -	- -		
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	232 Starlyn Avenue, New Albany, MS 38652		
Billing Account Number	NMP.MS.0019		
Speed	100 mb Ethernet		
Rate	\$ 3,000.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	1425 S Harper Road, Corinth MS 38834		
Billing Account Number	NMP.MS.0020		
Speed	100 mb Ethernet		
Rate	\$ 3,000.00		
Cost Itemization -	-		
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	1310 Main Street, Tishomingo, MS 38873		
Billing Account Number	NMP.MS.0021		
Speed	100 mb Ethernet		
Rate	\$ 3,000.00		
Cost Itemization -	- -		
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	906 Elm Street, Racine, OH 45771		
Billing Account Number	CHS.WV.0009		
Speed	10 mb Ethernet		
Rate	\$	2,150.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

TeleQuality Operating Cost Allocations			
	Ş	5	% of Income
Total Income	\$		
Estimated Expenses:			
Personnel - payroll, benefits and payroll taxes			
Operating - facilities, customer support, software, equipment, travel and insurance			
Administrative			
Bad debt expense			
Marketing			
Taxes and fees (other than income taxes)			
Total Estimated Expense	\$		
Overhead Expense Factor			
Excludes costs for meals and entertainment, debt costs inc	cluding origination	on and interes	st expense,
late fees and charitable contributions			
Estimated based on historical data			

CERTIFICATE OF SERVICE

I, Remington Pool, hereby certify that on this day, a true and correct copy of the foregoing letter was filed on ECFS and hand-delivered to, and filed with, the Office of the Secretary at the Federal Communications Commission.

Remington Pool June 25, 2018